

EXHIBIT B

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KAELI GARNER, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC. and AMAZON.COM
SERVICES LLC,

Defendants.

Case No. 2:21-cv-00750-RSL

**SERGE EGELMAN'S RESPONSES AND
OBJECTIONS TO DEFENDANTS'
SUBPOENA FOR THE PRODUCTION
OF DOCUMENTS**

Dr. Serge Egelman hereby provides the following Objections and Responses to Defendants Amazon.com Inc. and Amazon.com Services LLC's ("Defendants") Subpoena to Produce Documents. Dr. Egelman has not completed his investigation of the facts relating to this case, discovery in this action, or preparation for trial. Dr. Egelman provides these responses only to the extent that he possesses relevant and responsive information. Dr. Egelman reserves all his rights to supplement these responses should more information become available.

PRELIMINARY STATEMENT

All the answers contained herein are based only on such information and documents that are presently available to and specifically known to Dr. Egelman. Further investigation and discovery may supply additional facts, which may require these responses to be supplemented. Thus, the following responses are given without prejudice to Dr. Egelman's rights to supplement or amend them, or to produce evidence of subsequently discovered facts that Dr. Egelman may recall or learn at a later date.

OFFER TO CONFER

Dr. Egelman offers to confer in good faith to resolve any issues that may arise by virtue of these Responses and Objections.

SPECIFIC RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All engagement agreements for Your work in this Action.

RESPONSE TO REQUEST NO. 1:

Dr. Egelman objects to this Request to the extent it seeks privileged and confidential information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C). Dr. Egelman is not withholding documents based on these objections.

1 Subject to and without waiving the foregoing objections, Dr. Egelman will produce his
2 engagement agreement for this matter.

3 **REQUEST NO. 2:¹**

4 All documents describing the nature and scope of Your work related to this Action,
5 excluding communications protected from disclosure by Fed. R. Civ. P. 26(b)(4)(B) and (C).
6

7 **RESPONSE TO REQUEST NO. 2:**

8 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
9 information pursuant to Fed. R. Civ. P. 26(b)(3)(A). Dr. Egelman objects to this Request as
10 duplicative of Request No. 1. Dr. Egelman objects to this Request as overly broad and unduly
11 burdensome to the extent it asks for “all” documents, as opposed to “documents sufficient to show,”
12 and as vague and ambiguous to the extent it calls for documents describing the “nature” and “scope”
13 of Dr. Egelman’s work. Dr. Egelman is not withholding documents based on these objections.
14

15 Subject to and without waiving the foregoing objections, Dr. Egelman will produce his
16 engagement agreement for this matter, which is sufficient to show his assignment for this matter.

17 **REQUEST NO. 3:²**

18 Documents sufficient to show Your complete time and billing related to this Action.

19 **RESPONSE TO REQUEST NO. 3:**

20 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
21 information pursuant to Fed. R. Civ. P. 26(b)(3)(A), 26(b)(4)(B), and 26(b)(4)(C). Dr. Egelman is
22 not withholding documents based on these objections.
23
24
25

26 ¹ Defendants incorrectly numbered this Request as a second “Request for Production No. 1.”

27 ² Defendants incorrectly numbered this Request as “Request for Production No. 2.”

1 Subject to and without waiving the foregoing objections, Dr. Egelman will produce his time
2 and billing records for this Action, but with any privileged or confidential information redacted from
3 the billing descriptions.

4 **REQUEST NO. 4:**³

5 All documents You relied upon in the preparation of Your Report.

6 **RESPONSE TO REQUEST NO. 4:**

7 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
8 information pursuant to Fed. R. Civ. P. 26(b)(3)(A), 26(b)(4)(B), and 26(b)(4)(C). Dr. Egelman
9 objects to this Request as seeking documents that are publicly available or equally accessible to
10 Defendants. Dr. Egelman objects to this Request as seeking documents that are within Defendants'
11 possession, custody, or control. Dr. Egelman is not withholding documents based on these
12 objections.
13

14 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
15 all documents that Dr. Egelman relied on to prepare his Report are identified in his Report. Dr.
16 Egelman will produce documents identified in his Report that are not publicly accessible or require
17 payment or a subscription to access.
18

19 **REQUEST NO. 5:**

20 All documents You considered but did not rely upon when preparing Your Report.

21 **RESPONSE TO REQUEST NO. 5:**

22 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
23 information pursuant to Fed. R. Civ. P. 26(b)(3)(A), 26(b)(4)(B), and 26(b)(4)(C). Dr. Egelman
24 objects to this Request as seeking documents that are publicly available or equally accessible to
25
26

27 ³ Defendants incorrectly numbered this Request as "Request for Production No. 3."
28

1 Defendants. Dr. Egelman objects to this Request as seeking documents that are within Defendants'
 2 possession, custody, or control. Dr. Egelman is not withholding documents based on these
 3 objections.

4 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
 5 all documents that Dr. Egelman relied on to prepare his Report are identified in his Report. Dr.
 6 Egelman will produce documents identified in his Report that are not publicly accessible or require
 7 payment or a subscription to access.
 8

9 **REQUEST NO. 6:**

10 All documents You expect to rely upon for any opinions or expected testimony in this case
 11 that are not referenced in Exhibit B of Your Report.
 12

13 **RESPONSE TO REQUEST NO. 6:**

14 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
 15 information pursuant to Fed. R. Civ. P. 26(b)(3)(A), 26(b)(4)(B), and 26(b)(4)(C). Dr. Egelman
 16 objects to this Request as seeking documents that are publicly available or equally accessible to
 17 Defendants. Dr. Egelman objects to this Request as seeking documents that are within Defendants'
 18 possession, custody, or control. Dr. Egelman objects to this Request as vague and ambiguous to the
 19 extent it Requests documents Dr. Egelman "expect[s]" to rely on. Dr. Egelman is not withholding
 20 documents based on these objections.
 21

22 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
 23 all documents that Dr. Egelman relied on to prepare his Report are identified in his Report. Dr.
 24 Egelman will produce documents identified in his Report that are not publicly accessible or require
 25 payment or a subscription to access.
 26

27 **REQUEST NO. 7:**

1 All communications You relied upon in the preparation of Your Report, excluding
2 communications protected from disclosure by Fed. R. Civ. P. 26(b)(4)(B) and (C).

3 **RESPONSE TO REQUEST NO. 7:**

4 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
5 information pursuant to Fed. R. Civ. P. 26(b)(3)(A). Dr. Egelman objects to this Request to the
6 extent it seeks Defendants' own communications, which are equally accessible to Defendants and
7 within Defendants' possession, custody, or control.

8 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
9 other than any of Defendants' communications cited in the Report (*e.g.*, by bates number), no non-
10 privileged communications exist.
11

12 **REQUEST NO. 8:**

13 All communications that You expect to rely upon for any opinions or expected testimony in
14 this case, excluding communications protected from disclosure by Fed. R. Civ. P. 26(b)(4)(B) and
15 (C).
16

17 **RESPONSE TO REQUEST NO. 8:**

18 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
19 information pursuant to Fed. R. Civ. P. 26(b)(3)(A). Dr. Egelman objects to this Request to the
20 extent it seeks Defendants' own communications, which are equally accessible to Defendants and
21 within Defendants' possession, custody, or control.

22 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
23 other than any of Defendants' communications cited in the Report (*e.g.*, by bates number), no non-
24 privileged communications exist.
25

26 **REQUEST NO. 9:**

1 All documents relating to results of any tests or experiments conducted by You or at Your
2 direction relating to this Action.

3 **RESPONSE TO REQUEST NO. 9:**

4
5 Dr. Egelman objects to this Request objects as overly broad and unduly burdensome to the
6 extent it asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman
7 objects to this Request as vague and ambiguous to the extent it calls for the production of “tests” or
8 “experiments.” Dr. Egelman is not withholding any documents based on these objections.

9 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
10 no such documents exist.

11 **REQUEST NO. 10:**

12 All documents relating to any surveys conducted by You or at Your direction relating to this
13 Action.
14

15 **RESPONSE TO REQUEST NO. 10:**

16 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
17 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
18 this Request as vague and ambiguous to the extent it calls for the production of “surveys.” Dr.
19 Egelman is not withholding any documents based on these objections.

20 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
21 no such documents exist.

22 **REQUEST NO. 11:**

23 All documents relating to any interviews conducted by You or at Your direction related to
24 this Action.
25

26 **RESPONSE TO REQUEST NO. 11:**

1 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
 2 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
 3 this Request as vague and ambiguous to the extent it calls for the production of “interviews.” Dr.
 4 Egelman is not withholding any documents based on these objections.

5 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
 6
 7 no such documents exist.

8 **REQUEST NO. 12:**

9 All documents concerning Your knowledge, skill, experience, training, and education in the
 10 areas for which You seek to be qualified as an expert in this Action.

11 **RESPONSE TO REQUEST NO. 12:**

12 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
 13 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
 14 this Request as vague and ambiguous to the extent it calls for the production of documents
 15 concerning Dr. Egelman’s “knowledge, skill, experience, training, and education.” Dr. Egelman
 16 objects to this Request as seeking documents that are publicly available or equally accessible to
 17 Defendants. Dr. Egelman is not withholding any documents based on these objections.

18 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
 19 documents relating to Dr. Egelman’s “knowledge, skill, experience, training, and education” are set
 20 forth in his resume. Dr. Egelman will produce documents set forth in his resume that are not publicly
 21 accessible or require payment or a subscription to access.

22 **REQUEST NO. 13:**

23 All documents relating to each assumption You made in forming the opinions and
 24 conclusions in Your Report.

RESPONSE TO REQUEST NO. 13:

Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to this Request as vague and ambiguous to the extent it calls for the production of documents concerning any “assumption” Dr. Egelman made. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).

Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows: no such documents exist, and all documents that formed the basis for the opinions and conclusions in the Report are cited in his Report.

REQUEST NO. 14:

All sworn testimony by You as an expert witness, including affidavits, declarations, deposition transcripts or trial transcripts where You testified in the last four years.

RESPONSE TO REQUEST NO. 14:

Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it asks for “all” testimony, as opposed to “documents sufficient to show.” Dr. Egelman objects to this Request as overly broad and unduly burdensome because it seeks “all” “affidavits, declarations, deposition transcripts or trial transcripts” over a four-year period. Dr. Egelman objects to this Request to the extent it seeks documents that are publicly available and equally accessible to Defendants. Dr. Egelman objects to this Request to the extent it seeks expert materials that are privileged, confidential, or subject to protective orders in other matters. Dr. Egelman objects to this Request because he has already disclosed all matters to Defendants that he worked on as part of his May 10, 2024 expert disclosure.

Based on the foregoing objections, Dr. Egelman will not respond to this Request. Dr. Egelman is willing to meet and confer regarding the scope of this Request.

REQUEST NO. 15:

All documents relating to results described in Your publication, “Information Disclosure Concerns in The Age of Wearable Computing.”

RESPONSE TO REQUEST NO. 15:

Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to this Request as vague and ambiguous to the extent it calls for the production of documents concerning the “results” described in the above-referenced publication. Dr. Egelman objects to this Request as seeking documents that are publicly available or equally accessible to Defendants. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).

Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows: all documents that Dr. Egelman relied on in the publication, “Information Disclosure Concerns in The Age of Wearable Computing,” are set forth in the “References” section of the publication, which is publicly available.

REQUEST NO. 16:

All documents relating to responses to surveys that are described in Your publication, “Information Disclosure Concerns in The Age of Wearable Computing.”

RESPONSE TO REQUEST NO. 16:

Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to

1 this Request as vague and ambiguous to the extent it calls for the production of documents
 2 concerning the “responses to surveys” described in the above-referenced publication. Dr. Egelman
 3 objects to this Request as seeking documents that are publicly available or equally accessible to
 4 Defendants. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
 5 information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
 6

7 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
 8 all documents that Dr. Egelman relied on in the publication, “Information Disclosure Concerns in
 9 The Age of Wearable Computing,” are set forth in the “References” section of the publication, which
 10 is publicly available.
 11

12 **REQUEST NO. 17:**

13 All documents relating to results described in Your publication, “Privacy Attitudes of Smart
 14 Speaker Users. Proceedings on Privacy Enhancing Technologies.”

15 **RESPONSE TO REQUEST NO. 17:**

16 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
 17 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
 18 this Request as vague and ambiguous to the extent it calls for the production of documents
 19 concerning the “results” described in the above-referenced publication. Dr. Egelman objects to this
 20 Request as seeking documents that are publicly available or equally accessible to Defendants. Dr.
 21 Egelman objects to this Request to the extent it seeks privileged and confidential information
 22 pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
 23

24 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
 25 all documents that Dr. Egelman relied on in the publicly available publication, “Privacy Attitudes
 26
 27
 28

of Smart Speaker Users. Proceedings on Privacy Enhancing Technologies,” are identified in the publication as citations.

REQUEST NO. 18:

All documents relating to responses to surveys that are described in Your publication, “Privacy Attitudes of Smart Speaker Users. Proceedings on Privacy Enhancing Technologies.”

RESPONSE TO REQUEST NO. 18:

Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to this Request as vague and ambiguous to the extent it calls for the production of documents concerning the “responses to surveys” described in the above-referenced publication. Dr. Egelman objects to this Request as seeking documents that are publicly available or equally accessible to Defendants. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).

Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows: all documents that Dr. Egelman relied on in the publicly available publication, “Privacy Attitudes of Smart Speaker Users. Proceedings on Privacy Enhancing Technologies,” are identified in the publication as citations.

REQUEST NO. 19:

All documents relating to results described in Your publication, “Investigating Users’ Preferences and Expectations for Always-Listening Voice Assistants.”

RESPONSE TO REQUEST NO. 19:

Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to

1 this Request as vague and ambiguous to the extent it calls for the production of documents
 2 concerning the “results” described in the above-referenced publication. Dr. Egelman objects to this
 3 Request as seeking documents that are publicly available or equally accessible to Defendants. Dr.
 4 Egelman objects to this Request to the extent it seeks privileged and confidential information
 5 pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
 6

7 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
 8 all documents that Dr. Egelman relied on in the publicly available publication, “Investigating Users’
 9 Preferences and Expectations for Always-Listening Voice Assistants,” are set forth in the
 10 “References” section of the publication.
 11

12 **REQUEST NO. 20:**

13 All documents relating to responses to surveys described in Your publication, “Investigating
 14 Users’ Preferences and Expectations for Always-Listening Voice Assistants.”

15 **RESPONSE TO REQUEST NO. 20:**

16 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
 17 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
 18 this Request as vague and ambiguous to the extent it calls for the production of documents
 19 concerning the “responses to surveys” described in the above-referenced publication. Dr. Egelman
 20 objects to this Request as seeking documents that are publicly available or equally accessible to
 21 Defendants. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
 22 information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
 23

24 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
 25 all documents that Dr. Egelman relied on in the publicly available publication, “Investigating Users’
 26
 27
 28

1 Preferences and Expectations for Always-Listening Voice Assistants,” are set forth in the
 2 “References” section of the publication.

3 **REQUEST NO. 21:**

4 All documents relating to results described in Your publication, “I’ve got 99 problems, but
 5 vibration ain’t one: a survey of smartphone users’ concerns.”

6 **RESPONSE TO REQUEST NO. 21:**

7 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
 8 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
 9 this Request as vague and ambiguous to the extent it calls for the production of documents
 10 concerning the “results” described in the above-referenced publication. Dr. Egelman objects to this
 11 Request as seeking documents that are publicly available or equally accessible to Defendants. Dr.
 12 Egelman objects to this Request to the extent it seeks privileged and confidential information
 13 pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
 14

15 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
 16 all documents that Dr. Egelman relied on in the publicly available publication, “I’ve got 99
 17 problems, but vibration ain’t one: a survey of smartphone users’ concerns,” are set forth in the
 18 “References” section of the publication.
 19

20 **REQUEST NO. 22:**

21 All documents relating to responses to surveys that are described in Your publication, “I’ve
 22 got 99 problems, but vibration ain’t one: a survey of smartphone users’ concerns.”

23 **RESPONSE TO REQUEST NO. 22:**

24 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
 25 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
 26
 27

1 this Request as vague and ambiguous to the extent it calls for the production of documents
 2 concerning the “responses to surveys” described in the above-referenced publication. Dr. Egelman
 3 objects to this Request as seeking documents that are publicly available or equally accessible to
 4 Defendants. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
 5 information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
 6

7 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
 8 all documents that Dr. Egelman relied on in the publicly available publication, “I’ve got 99
 9 problems, but vibration ain’t one: a survey of smartphone users’ concerns,” are set forth in the
 10 “References” section of the publication.
 11

12 **REQUEST NO. 23:**

13 All documents relating to results described in Your publication, ““What can’t data Be used
 14 for?”: privacy expectations about smart TVs in the U.S.”

15 **RESPONSE TO REQUEST NO. 23:**

16 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
 17 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
 18 this Request as vague and ambiguous to the extent it calls for the production of documents
 19 concerning the “results” described in the above-referenced publication. Dr. Egelman objects to this
 20 Request as seeking documents that are publicly available or equally accessible to Defendants. Dr.
 21 Egelman objects to this Request to the extent it seeks privileged and confidential information
 22 pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
 23

24 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
 25 all documents that Dr. Egelman relied on in the publicly available publication, ““What can’t data
 26
 27
 28

Be used for?': privacy expectations about smart TVs in the U.S.," are set forth in the "References" section of the publication.

REQUEST NO. 24:

All documents relating to responses to surveys that are described in Your publication, "What can't data Be used for?': privacy expectations about smart TVs in the U.S."

RESPONSE TO REQUEST NO. 24:

Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it asks for "all" documents, as opposed to "documents sufficient to show." Dr. Egelman objects to this Request as vague and ambiguous to the extent it calls for the production of documents concerning the "responses to surveys" described in the above-referenced publication. Dr. Egelman objects to this Request as seeking documents that are publicly available or equally accessible to Defendants. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).

Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows: all documents that Dr. Egelman relied on in the publicly available publication, "What can't data Be used for?': privacy expectations about smart TVs in the U.S.," are set forth in the "References" section of the publication.

DATED: July 26, 2024

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PROOF OF SERVICE

I hereby certify that, on July 26, 2024, I served the foregoing document on all counsel of record via e-mail.

By: /s/ Max S. Roberts
Max S. Roberts